

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§	
	§	Case No. 23-11007-cgb
ARTIUSID, INC.,	§	
	§	Chapter 7
Alleged Debtor.	§	

**MOTION FOR ENLARGEMENT OF TIME TO FILE OMNIBUS REPLY TO
OBJECTIONS TO DISMISSAL MOTION, TO EXCEED PAGE LIMIT,
AND TO SET STATUS CONFERENCE**

Artius.iD, Inc., by and through undersigned counsel and pursuant to Fed. R. Bankr. P. 9006 and Local Rule 7007 of this Court, moves to extend the time to file a single Omnibus Reply to the several Objections to *Consent Stipulation and Motion for Dismissal of Involuntary Petition Under Chapter 7* [Docket No. 88] (the “Dismissal Motion”)¹ by fourteen (14) days, through and including September 26, 2024, for leave to exceed the 10-page limit for replies by filing an Omnibus Reply of not more than 25 pages, and for a non-evidentiary Status Conference to establish procedures governing further proceedings in this matter. In support of the requested relief, the Debtor relies upon the following facts and substantial matters of law.

1. On the late afternoon and into the late evening of September 5, undersigned counsel for Artius were served with three Objections directed to the Dismissal Motion,² totaling almost 200 pages with exhibits. Pursuant to Local Rule 7007(c), “a reply in support of a motion shall be

¹ Capitalized terms used and not otherwise defined herein are intended to have the meaning set forth in the Dismissal Motion.

² The three Objections (collectively, the “**Objections**”) are *Collaborative Vision LLC’s Objection to Consent Stipulation and Motion for Dismissal of Involuntary Petition Under Chapter 7* [Doc. No. 99] (the “**Collaborative Vision Objection**”), *Objection to Consent Stipulation and Motion for Dismissal of Involuntary Petition Under Chapter 7* [Doc. No. 100] (the “**US Trustee Objection**”), and *Trustee’s Response to Motion to Dismiss* [Doc. No. 101] (the “**Satija Objection**”).

filed not later than 7 days after the filing of the response to the motion,” such that the current deadline to file a reply -- or actually three separate replies -- is September 12, 2024.

2. Given the length of the Objections and exhibits thereto and their attempt to introduce facts and evidence not previously placed before the Court, Artius requires additional time to prepare and file its reply, and accordingly seeks an enlargement of time through and including September 26, 2024.

3. Pursuant to Local Rule 7007 (c)(3) of this Court, “[a] reply in support of a dispositive motion is limited to 10 pages . . . unless otherwise authorized by the Court.” In the interests of efficiency and in order to avoid redundancy and the disjointed filing of three separate replies of up to 10 pages each, Artius proposes to file a single Omnibus Reply of not more than 25 pages -- 5 pages less than the aggregate number of pages to which it is entitled under the foregoing Local Rule.

4. In addition, it appears from the Objections that the parties may be in disagreement about the legal effect of the Stay Order, and accordingly the standard by which the Court will evaluate the Dismissal Motion and Objections. Artius respectfully submits that the setting of a non-evidentiary status conference will assist the Court and parties to prepare for and focus their efforts at the evidentiary hearing to be held on the Dismissal Motion, Objection and Omnibus Reply.³ While that status conference can be held by Zoom, Artius respectfully requests that counsel and witnesses for all parties having the right to appear and be heard be required to appear in person in the courtroom for the evidentiary hearing.

³ Artius is aware of and appreciates the Court's setting of a status conference for Tuesday, September 10, and offers the suggestion of a further status conference after the filing of the Omnibus Reply if helpful to the Court to frame the issues for the final evidentiary hearing on the Dismissal Motion and Objections.

5. On Friday, September 6 undersigned counsel for Artius has reached out by email to counsel for each of the parties that filed the Objections in an effort to obtain their consent to the procedural relief requested in this Motion; however as of the filing of this Motion, no definitive response has been received from any of those counsel

WHEREFORE, Debtor artius.iD requests that the Court enter the annexed Order granting a fourteen (14)-day extension within which to file a single Omnibus Reply of not more than 25 pages, exclusive of caption, signature block, any certificate, and accompanying documents, through and including September 26, 2024, and for the setting of a non-evidentiary status conference to be conducted via Zoom at a date and time convenient to the Court and parties.

Dated: September 9, 2024

Respectfully Submitted,

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CERTIFICATE OF SERVICE


The undersigned hereby certifies that on September 9, 2024, he caused a copy of the foregoing *Debtor's Motion for Enlargement of Time to File Omnibus Reply to Objections to Dismissal Motion* to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Texas and on the parties listed below via First Class U.S. Mail.

/s/ Mark D. Bloom

Mark D. Bloom

See attached Matrix

Label Matrix for local noticing
0542-1
Case 23-11007-cgb
Western District of Texas
Austin

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End of Label Matrix
Mailable recipients 19
Bypassed recipients 0
Total 19

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re: ARTIUSID, INC., Alleged Debtor.	§ § § § §	Case No. 23-11007-cgb Chapter 7
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**ORDER GRANTING MOTION FOR ENLARGEMENT OF TIME TO FILE OMNIBUS
REPLY TO OBJECTIONS TO DISMISSAL MOTION, TO EXCEED PAGE LIMIT,
AND TO SET STATUS CONFERENCE**

THIS MATTER came before the Court on _____, _____, 2024, upon Artius.iD's *Motion for Enlargement of Time to File Omnibus Reply to Objections to Dismissal Motion, to Exceed Page Limit, and to Set Status Conference* [Docket No. ____] ("**Motion**"). By way of the Motion, Artius.iD seeks to extend the time to file a single Omnibus Reply to the several Objections to *Consent Stipulation and Motion for Dismissal of Involuntary Petition Under Chapter 7* [Docket No. 88] ("**Dismissal Motion**") by fourteen (14) days, through and including September 26, 2024, for leave to exceed the 10-page limit for replies by filing an Omnibus Reply of not more than 25

pages, and for a non-evidentiary Status Conference to establish procedures governing further proceedings in this matter. The Court having considered the Motion and otherwise being duly advised in the premises, it is hereby

ORDERED AND ADJUDGED AS FOLLOWS:

1. Artius.iD's Motion is hereby GRANTED.
2. Artius.iD may file a single Omnibus Reply of not more than 25 pages, exclusive of caption, signature block, any certificate, and accompanying documents, to the Objections to the Dismissal Motion by not later than September 26, 2024.
3. Following the submission of the Omnibus Reply, the Court may issue a further Order setting a non-evidentiary status conference to be conducted via Zoom at a date and time convenient to the Court and parties in interest.

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Submitted by:

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